

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND  
(Baltimore Division)**

<p>TODD FOWBLE</p> <p style="text-align: center;">PLAINTIFF,</p> <p>v.</p> <p>PRINCE GEORGE’S COUNTY, MARYLAND, <i>et al.</i></p> <p style="text-align: center;">DEFENDANTS.</p>	<p>CIVIL ACTION No.: 8:24-CV-01019-PX</p> <p><b><u>JURY TRIAL DEMANDED</u></b></p>
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**JOINT STATUS REPORT**

The Parties have conferred, and we are providing the following joint status report:

**1. Request for modification of initial Scheduling Order.**

The parties would request that the Court extend the dates ninety (90) days for purposes of discovery and filing Motions. Set forth below is a comparison of the current dates and the requested modifications:

<b><u>Current date</u></b>	<b><u>Description</u></b>	<b><u>Proposed Date</u></b>
10/15/2024	Rule 16 conference call	01/12/2025
11/08/2024	Moving for joinder of additional parties and amendment of pleadings	02/06/2025
11/25/2024	Plaintiff’s Rule 26(a)(2) expert disclosures	02/24/2025
12/23/2024	Defendant’s Rule 26(a)(2) expert disclosures	03/24/2025
01/06/2025	Plaintiff’s rebuttal Rule 26(a)(2) expert disclosures	04/07/2025

<u><b>Current date</b></u>	<u><b>Description</b></u>	<u><b>Proposed Date</b></u>
01/13/2025	Rule 26(e)(2) supplementation of disclosures and responses	04/14/2025
02/06/2025	Completion of Discovery; submission of Post-Discovery Joint status report	05/07/2025
02/13/2025	Requests for admission	05/14/2025
03/10/2025	Dispositive pretrial motions deadline	06/09/2025

**2. Consent to proceed before a United States Magistrate Judge.**

The parties do not unanimously consent to proceed before a Magistrate Judge.

**3. Report on mediation with a United States Magistrate Judge.**

The parties disagree regarding whether a settlement conference with a United States Magistrate Judge may be productive. If discovery changes the positions of the parties, counsel will advise the Court.

**4. Report on the scope of discovery.**

The parties intend to propound interrogatories, document requests and requests for admissions. The depositions of the named Defendants and the Plaintiff will be taken. The parties anticipate the depositions of additional fact witnesses will also be taken. Given the nature of the claims at issue, electronic discovery will be necessary in this case. The parties will review and be familiar with the Principles for the Discovery of Electronically Stored Information in Civil Cases prepared by a Joint bench/bar committee published on the court's website before the deadline for the parties to conference about electronic discovery indicated above. Counsel anticipates that they will be able to amicably work together to resolve any discovery disputes.

Thank you for Your Honor's time and consideration.

Very respectfully,

THE SHEPARD LAW FIRM, LLC

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